



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

FEB 20 2013

REPLY TO THE ATTENTION OF:

E-19J

J. Michael Bowen
Acting Division Administrator, Illinois Division
Federal Highway Administration
3250 Executive Park Drive
Springfield, Illinois 62703

**Re: EPA comments on the Illiana Corridor Tier 1
Final Environmental Impact Statement / Record of Decision, CEQ # 20130014**

Dear Mr. Bowen:

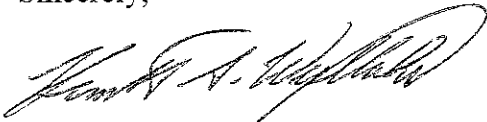
In accordance with U.S. Environmental Protection Agency (EPA) responsibilities under the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act, and the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), we have reviewed the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the above project and submit the following comments. This project has had extensive participation from natural resources agencies both through the established NEPA/Clean Water Act Section 404 merged process and various stakeholder meetings. These efforts have included extensive discussions on Purpose and Need concepts.

We applaud your agency's intent to use its new sustainability tool, INVEST, in Tier 2. However, the Tier 1 ROD commitment appears to be a study of a standard interstate limited-access highway, and lacks the commitment to explore the sustainable green infrastructure concepts cited in the FEIS Purpose Statement (Section 1.5). EPA continues to recommend that the Tier 2 studies and NEPA documents evaluate sustainable green infrastructure concepts capable of fulfilling current and future transportation needs. Sustainable infrastructure and coordinated local land-use planning will help protect open space and natural resources of the study area from transportation-induced development while providing for future transportation capacity expansion. This could include additional highway lanes, mass transit, freight rail, bicycle, pedestrian, and utility facilities. Sustainability could provide for open space and habitat connectivity along and across this entire corridor, and include opportunities for mitigation of this and other projects in the area.

Appendix J of the FEIS clearly presents a suite of land-use and local planning tools that could be implemented to promote sustainability in the Illiana Corridor including information on legal authorities and funding mechanisms. We commend FHWA for including this information and recommend these concepts be more fully explored in the Tier 2 studies and incorporated into the Tier 2 NEPA documents.

We look forward to working with the project team on the Tier 2 NEPA analyses. If you have any questions regarding our comments please contact me or my staff members, Norm West or Liz Pelloso, respectively at 312-353-5692, west.norman@epa.gov and 312-886-7425, pelloso.elizabeth@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth A. Westlake", written over a horizontal line.

Kenneth A. Westlake
Chief, NEPA Implementation Section
Office of Enforcement and Compliance Assurance

Cc: John Fortmann, Illinois Department of Transportation
Greg Kicinski, Indiana Department of Transportation
Joyce Newland, Federal Highway Administration, Indiana Division
Matt Fuller, Federal Highway Administration, Illinois Division